

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MISSOURI  
AT ST. LOUIS**

BRENDA K. WELLS, Administrator of the  
Estate of DOUGLAS S. WELLS, Deceased,

Plaintiff,

vs.

Cause No.: 4:09CV00382HEA

SKYJACK, INC., a Division of Linamar Corp.,  
a Canadian Corporation, and BOLZENIUS AND  
SONS ELECTRIC, INC., a Missouri Corporation,  
d/b/a BO CO ELECTRICAL & MECHANICAL  
and d/b/a BOCO, INC.,

Defendants.

**SKYJACK, INC.'S ANSWERS TO INTERROGATORIES  
OF BOLZENIUS AND SONS ELECTRIC, INC.**

NOW COMES the Defendant, SKYJACK, INC., by and through its attorneys, CASSIDAY  
SCHADE LLP, and in Answer to Interrogatories propounded by Defendant Bolzenius and Sons  
Electric, Inc., states as follows:

1. Please state:

- (a) The name and address of the person or persons answering these  
interrogatories;
- (b) His/her relationship to this defendant; and,
- (c) His/her position of employment.

**ANSWER:**

- (a) **Bradley Boehler  
c/o Cassiday Schade LLP  
1870 W. Winchester Road  
Suite 148  
Libertyville, Illinois 60048**
- (b) **Employee of Skyjack, Inc.**



shipped the subject lift. Skyjack has previously provided all counsel copy of the Operating Manual for the subject lift, and has attached the Operating, Maintenance, & Parts Manual to its Responses to Bolzenius and Sons Electric's Requests for Production.

14. Identify any and all complaints, lawsuits, or claims submitted to you relating to the alleged defect(s) of similar makes and models of the subject product in the last ten years, Skyjack lift, Model number SJM 3015, serial number 16498, referenced in plaintiff's petition.

**ANSWER:** Skyjack objects to this Interrogatory on the grounds that it is vague with respect to the terms "complaints," "similar," and "defects," is overly broad and unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, and to the extent it comprehends the Interrogatory, Skyjack has received sporadic and anecdotal information of screws or other objects being inserted into the housing of a lift enable button on similar model Skyjack scissor lifts.

15. Please state whether you performed any test, of whatever nature or description, for the purpose of determining whether the subject product, Skyjack lift, Model number SJM 3015, serial number 16498, met reasonable performance expectations for its intended use and describe each such test conducted.

**ANSWER:** Skyjack objects to this Interrogatory on the grounds that it is vague with respect to the phrase "met reasonable performance expectations for its intended use," is overly broad, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Skyjack designed and manufactured the Skyjack Model SJM 3015 in accordance with all applicable industry standards, including OSHA and ANSI A92.6-1990.

18. State whether or not Defendant Sky Jack Inc. is a subsidiary or affiliate of any other corporation and for each such corporation state the corporations name and the state of incorporation.

**ANSWER:** See Skyjack's Corporate Disclosure Statement, previously served on all counsel.

CASSIDAY SCHADE LLP

By: 

Attorneys for Defendant SKYJACK, INC.

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